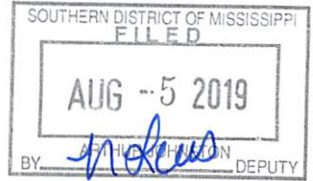


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION



IN THE MATTER OF THE SEARCH OF  
PEARL RIVER FOODS  
1012 PROGRESSIVE DRIVE  
CARTHAGE, MS 39051

Case No. 3:19mj 204 LRA

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR AN ADMINISTRATIVE SEARCH WARRANT**

I, Anthony Todd Williams Jr., being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for an administrative search warrant to search the following premises and seize the items listed in Attachment B:
  - a. The business is located at 1012 Progressive Drive, Carthage, Mississippi, 39051, and its curtilage and outbuildings, appurtenances, and attached and detached garages and vehicles and trailers located on such curtilage, including any and all parking lots and persons inside vehicles, more particularly described in Attachment A.
2. This affidavit is submitted in support of an application, pursuant to Title 8, United States Code, Section 1357, for a warrant to search the premises of Pearl River Foods (1012 Progressive Drive, Carthage, Mississippi, 39051) for undocumented illegal aliens.
3. I am a Special Agent with Homeland Security Investigations ("HSI"), within United States Immigration and Customs Enforcement ("ICE"). I am assigned to the Office of the Resident Agent in Charge, Jackson, Mississippi. I have been trained specifically in the investigation and elements of federal crimes at the Federal Law Enforcement Training Center at Glynco, Georgia. I hold Bachelors of Art and Masters of Science degrees in Criminal Justice

from the University of Southern Mississippi. I am also a graduate of the United States Border Patrol Academy at the Federal Law Enforcement Training Center in Artesia, New Mexico. I have approximately 11 years of experience as a federal law enforcement officer and criminal investigator.

4. My experience as a federal law enforcement officer and criminal investigator includes the investigation and prosecution of violations of criminal laws relating to unlawful entry, employment, and physical presence in the United States of individuals subject to the Immigration and Nationality Act. My current duties include conducting criminal investigations of violations of Federal Statutes and administrative violations of the Immigration and Nationality Act and Title 8 of the United States Code.

5. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. This affidavit is based on my knowledge arising from my participation in this investigation; upon information provided to me by other HSI agents, law enforcement officers and government officials jointly participating in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of a search warrant, it does not contain every fact known to me or other agents of HSI.

6. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that undocumented illegal aliens are present at PEARL RIVER FOODS. There is also probable cause to search the premises described in Attachment A for evidence of these crimes and contraband or fruits of these crimes, as described in Attachment B.

### **ADMINISTRATIVE PROBABLE CAUSE**

14. Homeland Security Investigations (HSI) Jackson, Mississippi, is investigating PEARL RIVER FOODS, for illegally employing subjects without work authorization in the United States. The Investigation has revealed PEARL RIVER FOODS (a chicken processing company in the state of Mississippi), is hiring and employing illegal aliens and/or subjects without employment authorization from the Department of Homeland Security. Initial queries within Immigration and Customs (ICE) databases revealed numerous illegal aliens currently working at the SUBJECT PREMISES.

15. On February 13, 2019, ICE Officers and HSI Special agents executed a criminal arrest and search warrant for Silvia Custodio-Morales, an illegal alien from Mexico, at 1007 Highway 35 South, Carthage, Mississippi. During the execution of said warrant, ICE agents found a counterfeit Tennessee Identification Card and a Social Security Card in the name of Angelica Maria Herrera. The counterfeit Tennessee Identification Card had Custodio-Morales' photo displayed on it. Custodio-Morales stated she was currently employed at the PEARL RIVER FOODS chicken processing plant at the SUBJECT PREMISES. According to Custodio-Morales, she had been employed at the SUBJECT PREMISES for approximately three weeks under the assumed identity of Angelica Maria Herrera.

16. On April 26, 2019, HSI Special Agent (SA) Todd Williams, and Enforcement and Removal Operations (ERO) Deportation Officer (DO) Francisco Ayala interviewed Custodio-Morales at the HSI Jackson, Mississippi office. During the interview, Custodio-Morales stated that a Hispanic female helps people apply for jobs at the plant in Carthage. Custodio-Morales stated there were numerous illegal aliens working at the SUBJECT PREMISES, including a shift supervisor.

17. On February 21, 2019, Angelica Maria Herrera, whose personal identifying information (PII) was being utilized by Custodio-Morales to gain employment at PEARL RIVER FOODS, was interviewed by ICE Officers Marcos Ramirez and Cecilio Banliezos. Herrera provided the following information during the interview:

- a. Herrera stated she was aware her PII was being utilized by others.
- b. Herrera stated she became aware her PII was being utilized by others when she applied for food stamps.
- c. Herrera stated she has never worked or applied for work at PEARL RIVER FOODS in Carthage, Mississippi.

18. On February 13, 2019 HSI agents served an Immigration Enforcement Subpoena (ICE-HSI-GU-2019-00053) to PEARL RIVER FOODS for the original employee file of Angelica Maria Herrera and a list of all current employees, to include: date of birth, social security numbers (SSN), and dates of hire. On February 15, 2019, PEARL RIVER FOODS provided the requested information for three hundred thirty-seven (337) employees. Analysis of the information provided by PEARL RIVER FOODS indicated numerous employees were utilizing stolen PII to gain employment, utilizing social security numbers that do not match to the assigned name, utilizing social security numbers that have been reported as belonging to a deceased individual, or are previously encountered aliens present in the United States without work authorization.

19. A review of the requested list of employees from PEARL RIVER FOODS indicated numerous employees were utilizing stolen PII to gain employment at the SUBJECT PREMISES. Below are examples of subjects utilizing stolen PII to gain employment at the SUBJECT PREMISES.

- a. On June 3, 2019, Special Agent (SA) Brent Druery contacted Linda Nunez, who had previously reported to the Federal Trade Commission that her PII was used to gain employment at PEARL RIVER FOODS. Nunez stated she learned someone was utilizing her identification documents after applying for unemployment benefits and being denied. Nunez stated she received a letter from the unemployment office stating her claim was denied due to current employment at PEARL RIVER FOODS. Nunez stated she has neither worked at nor applied for employment at PEARL RIVER FOODS. Nunez stated she contacted PEARL RIVER FOODS regarding her PII being utilized to gain employment. Nunez stated she was requested to send an email to [cjohnson@pearlriverfoods.net](mailto:cjohnson@pearlriverfoods.net).
- b. On June 6, 2019, SA Brent Druery contacted Robert Barr. SA Druery identified an employee at PEARL RIVER FOODS, Nicholas Israel Barrera, utilizing the social security number assigned to Barr, to gain employment at PEARL RIVER FOODS. Barr stated he was unaware his social security number was being utilized to gain employment in Mississippi. Barr stated he has neither worked at nor applied for employment at PEARL RIVER FOODS.
- c. On June 11, 2019, SA Brent Druery interviewed Marisol Ledesma. SA Druery identified an employee at PEARL RIVER FOODS, Ezequiel Alejandro Vital, was utilizing the social security number assigned to Ledesma, to gain employment at PEARL RIVER FOODS. Ledesma stated she was unaware her social security number was being utilized to gain employment in

Mississippi. Ledesma stated she has neither worked at nor applied for employment at PEARL RIVER FOODS.

20. Further analysis of the information provided by PEARL RIVER FOODS, indicated employees were utilizing social security numbers that have been reported as belonging to deceased individuals to gain employment at PEARL RIVER FOODS. Analysis of information provided by PEARL RIVER FOODS revealed employee Enoc Algarin Baez, utilizing social security number XXX-XX-6332 and employee Antonio Dominquez Juan, utilizing social security number XXX-XX-0588, are both actively utilizing social security numbers assigned to deceased individuals.

#### **ALTERNATIVES TO DETENTION**

21. ICE routinely utilizes the Alternatives to Detention (ATD) Program for subjects in ICE custody. The Alternatives to Detention Program is a flight-mitigation tool that uses technology and case management to ensure compliance with release conditions and facilitate alien compliance with court hearings and final orders of removal while allowing aliens to remain in their community contributing to their families, community organizations, and, if necessary, wrapping-up their affairs in the United States as they move through immigration proceedings. The ATD Program is not a substitute for detention nor is it used as a removal tool; however, the program may be appropriate for an alien who is released pursuant to: an Order of Release on Recognizance (OREC), an Order of Supervision (OSUP), a grant of parole; or a bond (unless the immigration judge or board of immigration appeals has determined custody and did not include ATD as a provision).

22. To be eligible for the ATD program participants must be adults 18 years of age or older, be removable, and be at some stage of immigration proceedings. The ATD Program

supervises participants, with contractor support, utilizing a combination of home visits, office visits, alert response, court tracking, and technology. The current government contractor (BI Inc.) for ATD operates under the Intensive Supervision Appearance Program (ISAP). The contract known as the ISAP III allows ATD officers the ability to determine the frequency of home and office visits, types of technology, telephonic, GPS or SmartLink, court and alert management. Case management levels and technology assignment can be reviewed and adjusted by the ATD officer at any time depending upon change in circumstances and compliance. The ATD Program utilizes three (3) different forms of technology that help monitor participants while enrolled in the program. The forms of technology include:

- a. Telephonic reporting utilizing a participant's voice to create a biometric voiceprint during the enrollment process. Every time the participant calls in his/her voice is compared against the voiceprint.
- b. GPS monitoring requires at least three (3) satellites to locate a unit attached to the participant's ankle. When a participant is within range of more than three satellites a GPS unit provides accurate data regarding the participant's location.
- c. SmartLink enables ATD officers and case specialists to keep participants focused on the conditions of release via their smartphone or tablet, they are able to verify a participant's identity, determine their location, and quickly collect status change information.

## **ILLEGAL ALIENS ENROLLED IN ATD & EMPLOYED BY PEARL RIVER FOODS**

23. Enrollment in the ATD program does not grant immigration benefits, including employment authorization. Queries of the subjects currently enrolled in the ICE Jackson ATD program, showed 19 illegal aliens, working at the SUBJECT PREMISES as of July 29, 2019.

a. On December 23, 2015 Maria Berduo-Agustin, a Guatemalan national, was encountered by United States Border Patrol (USBP) agents near Presidio, Texas. At the time of the encounter, USBP agents determined Berduo-Agustin had unlawfully entered the United States from Mexico, at a place other than as designated by the Secretary of Homeland Security and did not possess legal documents to work or reside in the United States. Berduo-Agustin was arrested by USBP and transported to the Presidio, Texas Border Patrol Station for further administrative processing. Berduo-Agustin was processed for an Expedited Removal and turned over to ICE for custody determination. At that time, Berduo-Agustin provided ICE with an address of 47 Page St., Canton, Mississippi, and was enrolled in the ICE/ERO/ATD program with GPS monitoring pending removal from the United States. On May 17, 2019 Berduo-Agustin reported to HSI agents that she is currently employed with PEARL RIVER FOODS, at the SUBJECT PREMISES. Queries of the historical GPS coordinates associated with Berduo-Agustin's electronic monitoring ankle bracelet revealed numerous daily captured coordinates located within the SUBJECT PREMISES multiple times a week. Analysis of historical GPS coordinates revealed upon arriving at the SUBJECT PREMISES, Berduo-Agustin remains at the SUBJECT PREMISES for



approximately 8 to 10 hours. For example, on July 24, 2019, at approximately 3:44 pm Berduo-Agustin arrived at the SUBJECT PREMISES and remained until approximately 12:46 am on July 25, 2019, when she departed and returned to her residence. Record checks for Maria Berduo-Agustin revealed she does not possess employment authorization from the United States Department of Homeland Security and she is subject to final order of removal.

b. On June 27, 2018 Blanca Leticia Perez-Lopez, a Guatemalan national, was encountered by USBP agents near Roma, Texas. At the time of the encounter, Perez-Lopez reported being 7 months pregnant. USBP agents determined Perez-Lopez had unlawfully entered the United States from Mexico, at a place other than as designated by the Secretary of Homeland Security and did not possess legal documents to work or reside in the United States. Perez-Lopez was arrested by USBP and transported to the Rio Grande Border Patrol Station for further administrative processing. Perez-Lopez was served with a Notice of Intent/Decision to Reinstate Prior Order (I-871) and turned over to ICE for custody determination. At that time, Perez-Lopez provided ICE with an address of 726 S Raleigh St., Forest, Mississippi, and was enrolled in the ICE/ERO/ATD program with GPS monitoring pending removal from the United States. Queries of the historical GPS coordinates associated with Perez-Lopez' electronic monitoring ankle bracelet revealed numerous daily captured coordinates located within the SUBJECT PREMISES multiple times a week. Upon arriving at the SUBJECT PREMISES, Perez-Lopez remains at the SUBJECT PREMISES for approximately 8 to 10 hours. For example, on May 3, 2019, at approximately

3:43 pm Perez-Lopez arrived at the SUBJECT PREMISES. Perez-Lopez remained at the SUBJECT PREMISES until approximately 2:23 am on May 4, 2019, when she departed and returned to her residence. Record checks for Perez-Lopez revealed she does not possess employment authorization from the United States Department of Homeland Security.

c. On September 5, 2018 Telma Veronica Agustin-Felix, a Guatemalan national, was encountered by United States Border Patrol (USBP) agents in the Rio Grande Valley near El Paso, Texas. At the time of the encounter, USBP agents determined Agustin-Felix had unlawfully entered the United States from Mexico, at a place other than as designated by the Secretary of Homeland Security and did not possess legal documents to work or reside in the United States. Agustin-Felix was arrested by USBP and transported to the Ysleta Border Patrol Station for further administrative processing. Agustin-Felix was served with a Notice to Appear (I-862) and turned over to ICE for custody determination. At that time, Agustin-Felix provided ICE with an address of 4735 Old Highway 80, Bolton, Mississippi 3941, and was enrolled in the ICE/ERO/ATD program with GPS monitoring pending removal from the United States. Queries of the historical GPS coordinates associated with Agustin-Felix' electronic monitoring ankle bracelet revealed numerous daily captured coordinates located within the SUBJECT PREMISES. Historical GPS coordinates also revealed Agustin-Felix travels from her current address to the SUBJECT PREMISES multiple times a week. Upon arriving at the SUBJECT PREMISES, Agustin-Felix remains on the SUBJECT PREMISES for approximately 8 to 10 hours. For example, on July 25,

2019, at approximately 3:57 pm Agustin-Felix arrived at the SUBJECT PREMISES. Agustin-Felix remained at the SUBJECT PREMISES until approximately 1:04 am on July 26, 2019, when she departed and returned to her residence. Record checks for AGUSTIN-Felix revealed she does not possess employment authorization from the United States Department of Homeland Security.

#### **SURVEILLANCE CONDUCTED AT SUBJECT PREMISES**

24. The following license plate numbers and subsequent vehicle registration information were obtained from vehicles observed entering the SUBJECT PREMISES:

<b>STATE</b>	<b>LPN</b>	<b>REGISTERED NAME &amp; ADDRESS</b>
MS	SDF409	Pascual GOMEZ BAUTISTA, xx Sessums St, Apt Cx, Morton, MS
MS	SBA9748	Melinda SANTIZO, xx Sessums St, Apt Gx Morton, MS
MS	ATR384	Voncilla VANCE, xxx Clark Rd, Apt Ax, Kosciusko, MS
MS	LJA1050	Baldomero Orozco JUAREZ, xxx½ S Van Buren St, Carthage, MS
MS	LJU567	Rabe CROSBY, xxxx Harmony Community Rd, Carthage, MS
MS	FLAV	Vanillife BLAYLOCK, xxx Pickens Circle, Carthage, MS
MS	LJA3979	Breanna ROBINSON, xxx Johnson Ln, Kosciusko, MS
MS	LJQ067	Lazaro AGUILON CARDONA, xxxx Minerva St, Carthage, MS
MS	SBA5299	Juan MENDOZA GARCIA, xxx N Banks St, Apt 202, Forest, MS
MS	LJA5486	Romeo CARDONA MIRANDA, xxx East Main St, Carthage, MS
MS	LJA5745	Eva LOPEZ SANTA, xxx Ware St, Carthage, MS
MS	LJA5147	Euelio SALVADOR PEREZ, xxx Hwy 35 S, Carthage, MS
MS	HLA4392	Latasha SMITH, xxxxx Hwy 49, Tchula, MS
MS	SBA1941	Bartolo Silvestre PEREZ, xxx Cleveland St, Forest, MS
MS	SBA9360	Pascual JACINTO-SANTIZO, xxxx E Seventh St, Lot x, Forest, MS
MS	LJA1090	Charvonte ROBY, xxx Old Canton Rd, Lot xx, Carthage, MS
MS	LJP503	Braulio LOPEZ GARCIA, xxx Highland St, Carthage, MS
MS	SBA4861	Gaspar ALONZO, xxx N Banks St, Apt xxx, Forest, MS
MS	SBA9525	Isabela RAMOS GARCIA, xxx South Main St, Forest, MS
MS	LJA5024	Tyesha BROWN, xxx Mallett Rd, Kosciusko, MS
MS	SBA3486	Carlos Puac ORDONEZ, xxx Hillsboro St, Apt x, Forest, MS
MS	SDE902	Laura MACARIO RAMOS, xxxx East 7 <sup>th</sup> St, Lot x, Forest, MS
MS	LJA1862	Maria Veronica Temaj MATIAS, xxx Dickens St, Carthage, MS
MS	SBA8388	Francisco ALONZO LUCAS, xxx Pace St, Forest, MS
MS	F5106	Kathy LADD, xxxxx BIA 0241, Philadelphia, MS

MS                      SBA9260              Eulalia FELIPE AGUSTIN, xxx E Oak St, Apt x, Forest, MS

25.     The names of registered vehicle owners were cross referenced with the 2019 first quarter wage report for PEARL RIVER FOODS that was submitted to the Mississippi Department of Employment Security. Based on registration information for the twenty-six (26) identified vehicles, only the following eight (8) registered vehicle owners were listed on the quarterly wage report as active employees with PEARL RIVER FOODS:

- a. Melinda SANTIZO
- b. Vanillife BLAYLOCK
- c. Rabe CROSBY
- d. Kathy LADD
- e. Tyesha BROWN
- f. Breanna ROBINSON
- g. Voncille VANCE
- h. Latasha SMITH

26.     The Mississippi Employment Protection Act, passed by the Mississippi Legislature in 2008, requires all employers in the state of Mississippi to utilize E-Verify to determine whether employees are eligible to work. E-Verify is a web-based system that allows enrolled employers to confirm the eligibility of their employees to work in the United States. E-Verify employers verify the identity and employment eligibility of newly hired employees by electronically matching information provided by employees on the Form I-9, Employment Eligibility Verification, against records available to the Social Security Administration (SSA) and the Department of Homeland Security (DHS).

27.     In May 2019, HSI Jackson requested a list of all employees queried through the E-Verify system by PEARL RIVER FOODS. In May 2019, HSI Jackson received the requested data extraction for all employees previously run through the E-Verify System by PEARL RIVER FOODS. The spreadsheet contained the name, date of birth, social security number, and hire

date for 306 employees that were previously queried for employment verification purposed through E-Verify by PEARL RIVER FOODS. Based on registration information for the twenty-six (26) identified vehicles observed on surveillance above, only the following two registered vehicle owners were run through E-Verify by PEARL RIVER FOODS:

a.Melinda Santizo

b.Charvonte Roby

28. On June 4, 2019, HSI Jackson conducted surveillance at the SUBJECT PREMISES. Surveillance was established by SA Brent Druery at approximately 1:50 pm and concluded at approximately 3:55 pm. During this time, SA Druery observed approximately 204 individuals enter or leave the business through multiple entrances located on the east side of the building. The following license plate numbers and subsequent vehicle registration information were obtained from vehicles observed parked at the PEARL RIVER FOODS facility in Carthage, MS:

<b>STATE</b>	<b>LPN</b>	<b>REGISTERED NAME &amp; ADDRESS</b>
MS	LJA5333	Braulio Lopez Garcia, xxxx Minerva St, Carthage, MS
MS	LJA3225	Lana Holloway, xxx Yellow Creek Road, Carthage, MS
MS	LJV272	Henry Boone, xxxx Red Dog Rd, Carthage, MS
MS	LJX727	Jemaine Crosby, xxxx Harmony Rd, Carthage, MS
MS	LJ9988	Esmera or Teresa Chavez, xxx North West St, Carthage, MS
MS	ATV649	Carolyn Johnson, xxxx Attala Road 1020, Kosciusko, MS
MS	CTA2200	Kamilah Guillory, xxx St Paul Street, Carthage, MS
MS	SBA0504	Karen Strong, xxx S Strong Ln, Forest, MS
MS	SBS1233	Adelso Jimenez Macario, xxx E Second St, Forest, MS
MS	SDC531	Pedro Martin Gomez, xxx N Davis St, Forest, MS
MS	SCX868	Pascual Perez Perez, xxx N Broad St, Forest, MS
MS	SBA9839	Alonzo Domingo Gregorio, xxx Hillsboro St, Forest, MS
MS	RAD5499	Sharon D Warren, xxx Rylee Dr, Lena, MS
MS	SDC379	Victor Tadeo Lucas, xxxxx Highway 80, Forest, MS
MS	SBA1930	Emilia Lopez Cuesta, xxx George St, Forest, MS
MS	SBA8567	Lidia Isabel Perez, xxx Old HWY 35, Forest, MS
MS	LJM743	Maria Comby, xxx Chitto Cove, Walnut Grove, MS

MS	LJA6066	Rebeca Orozco, xxx Euclid St, Carthage, MS
MS	LJV736	Horacio Berduo Perez, xxx Dorrill St, Carthage, MS
MS	SBB0544	Artemio Lopez Lopez, xxx Old Highway 35, Forest, MS
MS	LJA6302	Elmer Garcia, xxx E Franklin St, Carthage, MS
MS	SDC271	Cecilia Lastor, xxx Hillsboro St, Forest, MS
MS	LJA0450	Mayra Perez, xxx Pine St, Carthage, MS
MS	SBA8664	Florencia Alonzo Alonzo, xxx E First St, Forest, MS
MS	SCN905	Gerber Edibert Chilel Ramirez, xxx Battle Rd, Forest, MS
MS	LJA5942	Noe Temaj, xxx Williams St, Carthage, MS
MS	SBA6383	Andres Lucas Gomez, xxx Hillboro Rd, Forest, MS
MS	LJA0553	Stefanie Milner, xxx Wiggins Loop Rd, Carthage, MS

29. The names of registered vehicle owners were cross referenced with the 2019 first quarter wage report for PEARL RIVER FOODS that was submitted to the Mississippi Department of Employment Security. Based on registration information for the twenty-eight (28) identified vehicles, only three (3) registered vehicle owners were listed on the quarterly wage report as an active employee with PEARL RIVER FOODS:

- a. Maria Comby
- b. Carolyn Johnson
- c. Henry Boone

30. The names of registered vehicle owners were cross referenced with the list of employees run through E-Verify by PEARL RIVER FOODS. Based on registration information for the twenty-eight (28) identified vehicles, none of the above listed subjects were listed on the E-Verify spreadsheet. Based on my knowledge, training, and experience, your affiant is aware that illegal aliens often gain employment through the use of stolen or compromised PII. However, the illegal aliens tend to register vehicles and other items in their real names. Your affiant is aware through knowledge and experience that this is the reason there is such a large discrepancy in the cross reference of registered vehicle owners and those individuals listed on the first quarter wage report and the E-Verify extraction reports.

31. This affidavit is being submitted simultaneously with a criminal warrant for inspection to search at PEARL RIVER FOODS, located at 1012 Progressive Drive, Carthage, Mississippi, 39051, for evidence of unlawfully employing illegal aliens.

### **CONCLUSION**

32. Based on the facts and information as stated in this affidavit and my training and experience, I submit that this affidavit supports probable cause for a warrant to search the PREMISES described in Attachment A to seize the items described in Attachment B.

33. Based upon my training and experience, combined with the facts and observations set forth in the foregoing paragraphs, I have reason to believe that undocumented illegal aliens are present at 1012 Progressive Drive, Carthage, Mississippi, 39051.

34. In consideration of the facts presented, I respectfully request that this Court issue a search warrant for the premises located at 1012 Progressive Drive, Carthage, Mississippi, 39051, and all appurtenances thereto as more fully described in Attachment A and authorize the seizure of the items described in Attachment B to this Affidavit.

**REQUEST FOR SEALING**

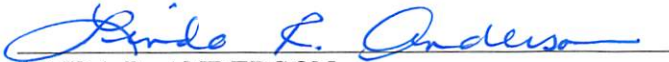
35. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

Respectfully submitted,



\_\_\_\_\_  
Anthony Todd Williams Jr.  
Special Agent  
US Immigration and Customs Enforcement  
Homeland Security Investigations

Subscribed and sworn to before me on the 5<sup>th</sup> day of August, 2019



\_\_\_\_\_  
LINDA R. ANDERSON  
UNITED STATES MAGISTRATE JUDGE